

March 14, 2018

Dear Senate Transportation Committee Members

As a driver education instructor familiar with the various instructor preparation programs in Michigan, the introduced version of Senate Bill 866 is cause for great alarm. It strips away high standards for the instructors who train instructors and allows a practicum to occur before classroom and theory is provided, which can be dangerous.

I am recommending the bill be amended as follows. I have removed the unwanted text from the original bill and inserted language others in the industry could probably rally around. I've also provided rationale, as necessary.

256.643 Driver education instructor preparation program.

Sec. 23.

(1) A college or university or a person approved by the secretary of state may present a driver education instructor preparation program. A college, university, or person shall not offer to engage or engage in the activity of presenting a driver education instructor preparation program without the prior approval of the secretary of state.

(2) A college, university, or person may apply to the secretary of state for approval to conduct a driver education instructor preparation program. A college, university, or person seeking approval shall present satisfactory evidence to the secretary of state as prescribed by the secretary of state that the college's, university's, or person's proposed program meets the requirements of this section.

(3) The secretary of state shall review and approve a driver education instructor preparation program that meets the requirements of this section. The secretary of state shall give the college, university, or person requesting approval a written notice of the secretary of state's approval or denial, including the reason for any denial.

(4) The secretary of state shall prepare a driver education instructor preparation program guide as a model for how to conduct a driver education instructor preparation program. The model program guide shall identify the content **AND ACCEPTABLE DELIVERY FORMATS** of each course identified in subsection (7). [Rationale: Clarifies that MDOS not only approves content, but also format of delivery, as referenced in subsection (8).]

(5) Beginning September 1, 2007, a driver education instructor preparation program shall consist of not less than 4 driver education preparation courses.

(6) A college, university, or person seeking approval of a driver education instructor preparation course shall present evidence satisfactory to the secretary of state that the proposed course meets the requirements of this section. The secretary of state shall review a driver education instructor preparation course and determine whether that course meets the requirements of this act. The secretary of state shall prescribe the administration and curriculum of a driver education instructor preparation course. The secretary of state shall give the college, university, or person requesting approval written notice of the secretary of state's approval or denial, including the reason for any denial.

(7) A driver education instructor preparation program shall consist of not less than 4 driver education instructor preparation courses. **THE THREE COURSES DESCRIBED IN SUBDIVISIONS (A) THROUGH (C) MAY BE OFFERED SYNCHRONOUSLY, AND THE PRACTICUM DESCRIBED IN SUBDIVISION (D) MAY ONLY BE OFFERED AFTER SUCCESSFUL COMPLETION OF THE COURSES DESCRIBED IN SUBDIVISIONS (A) THROUGH (C).** The 4 required courses shall each concentrate on only 1 of the following concepts, and all of the following concepts shall be covered in the minimum 4 courses required: [Rationale: The American Driver and Traffic Safety Education believes all three (a-c) courses should happen before the practicum.]

(a) Driver task analysis.

(b) Developing classroom and program knowledge. [Rationale for removing the allowance for people with teaching certificates to "test out" of this course: This course is not only about classroom knowledge; it is also about program knowledge, arguably and specifically relating to driver education. All instructors must have adequate program knowledge in the subject matter.]

(c) Developing vehicle operation skills.

(d) Practicum.

(8) A driver education instructor preparation course **MAY DELIVER CONTENT IN EITHER A CLASSROOM OR AN ONLINE FORMAT, OR A COMBINATION OF BOTH, AS PRESCRIBED IN THE MODEL PROGRAM GUIDE LISTED IN SUBSECTION (4),** and shall consist of not less than 2

~~semester~~ **35 CONTACT** hours per course ~~or the equivalent of not less than 2 semester hours per course as approved by the secretary of state.~~ A driver education instructor preparation course shall extend for not less than **1 WEEK** ~~3 weeks~~. [Rationale: The ANSTSE model standards require a minimum of 35 hours, not 30. Also, I use the term "model program guide," not "curriculum" (as used in the bill), since my term used in subsection (4), and the other term is not. I would also recommend the state not allow more than 50% of the course to be conducted online. Instructors-in-training need to conduct lessons in front of other trainees in order to be critiqued on their in-class and in-car performances.]

(9) An instructor who teaches a driver education instructor preparation course shall meet the following requirements:

(a) Have a ~~master's~~ **BACHELOR'S** degree in education from an accredited college or university **OR HAVE A MASTER TRAINER CERTIFICATE ISSUED BY A COLLEGE OR UNIVERSITY, OR AN AFFILIATE OF A COLLEGE OR UNIVERSITY**. [Rationale: Arguably, it might be getting too difficult to find Master's degree candidates, so the allowance of a Bachelor's degree in education is acceptable. However, allowing someone to train instructors who has no college degree and no formal teacher training and who has simply been teaching DE for 4 years (as proposed in the original bill) will create a race to the bottom. Removing the 4-year-teaching allowance in SB 866 and replacing it with the master trainer requirement allows people a professional pathway to teaching and comports with the ANSTSE standards. This would create two pathways to instructor certification (Bachelors and Master Trainer).

(b) Hold a valid driver education instructor certificate issued by the secretary of state.

**(C) HAVE A MINIMUM OF 4 YEARS OF DRIVER EDUCATION CLASSROOM AND BEHIND-THE-WHEEL TEACHING EXPERIENCE.**

[Rationale: I agree with requiring a minimum number of years of DE experience, but why only classroom experience? The student should not be given behind-the-wheel training in their practicum by someone who teaches classroom only and has never taught behind-the-wheel.]

**(D) SUCCESSFULLY PASS A KNOWLEDGE TEST COVERING THE MICHIGAN VEHICLE CODE, AS DEVELOPED BY THE SECRETARY OF STATE.** [Rationale: Most professional licenses (doctors, realtors, etc.) require formal education, and also require passing a "jurisprudence" test, which is a test of the state's law within the subject matter. Driver educators should know Michigan traffic laws before teaching it to children.]

(eE) Any other requirement the secretary of state determines is necessary to determine instructor qualifications.

(10) A college, university, or person approved by the secretary of state that offers a driver education instructor preparation course shall include in the course registration material information explaining the driver education instructor qualifications required under this act.

(11) The secretary of state shall review each driver education instructor preparation program approved under this section at least once every 3 years.

(12) A driver education preparation course credit earned through a college, university, or another entity in another state may be accepted on the same basis as the equivalent credit earned through a driver education instructor preparation program conducted by a college or university or by a person approved by the secretary of state, if approved by the secretary of state. A person seeking approval of a driver education course credit earned in another state shall present satisfactory evidence to the secretary of state that the other state's course substantially meets the requirements of this state. The secretary of state shall review a driver education preparation course credit earned in another state and determine whether that course content meets the requirements of this act. The secretary of state shall give the person a written notice of the secretary of state's approval or denial, including the reason for any denial.

(13) This section does not apply to an applicant for a driver education instructor certificate that is limited to the truck driver training classification.

Sincerely,

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